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May 23, 2024

**VIA ECF**

Hon. Katherine Polk Failla  
United States District Judge  
Thurgood Marshall United States Courthouse  
40 Foley Square, Courtroom 618  
Southern District of New York  
New York, NY 10007

**MEMO ENDORSED**

**Re: *Hansen, et al. v. Gerson Lehrman Group, Inc.*, 24 Civ. 2194  
*Whelan, Jr., et al. v. Gerson Lehrman Group, Inc.*, 24 Civ. 2202  
*Knapp, et al. v. Gerson Lehrman Group, Inc.*, 24 Civ. 2229  
*Miller, et al. v. Gerson Lehrman Group, Inc.*, 24 Civ. 2725  
GRSM File No.: 1348295**

Dear Judge Failla:

Our firm represents the interests of Gerson Lehrman Group, Inc. in connection with the above-referenced matters. We respectfully write, together with Plaintiffs in the above-referenced matters, pursuant to Your Honor's April 23, 2024 Order (24 Civ. 2194, Dkt. No. 9) and Your Honor's Individual Rules of Practice 2(C)(i) to respectfully jointly request a 30-day adjournment of the initial pre-trial conference scheduled for May 30, 2024 at 10:00 a.m.

In preparation for the conference, the Parties worked together to draft a joint letter pursuant to Your Honor's April 23, 2024 Order, which has been filed (24 Civ. 2194, Dkt. No. 13). In drafting the letter, Defendant raised the issue regarding Defendant's Terms and Conditions of Network Membership, which Defendant maintains compels mandatory arbitration of the above-referenced matters. The Parties met and conferred regarding this issue on May 22, 2024 and agreed to request an adjournment of the initial pre-trial conference to allow additional time to meet and confer regarding the issue.

As such, the Parties respectfully request a 30-day adjournment of the initial pre-trial conference scheduled for May 30, 2024 at 10:00 a.m. The Parties further request that the time for Defendant to answer, move or otherwise respond to the Complaint in the above-referenced matters be stayed until the adjourned initial pre-trial conference. This is our first request to adjourn the initial pre-trial conference and does not affect any other scheduled dates. As indicated above, Plaintiffs' counsel in each of the above-referenced matters consents to and joins in this request.

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We thank you in advance for your consideration of this request. Should Your Honor have any questions or require additional information, please do not hesitate to contact the undersigned.

Respectfully submitted,

GORDON REES SCULLY MANSUKHANI, LLP

*/s/ John Mills*

John T. Mills

JTM/AMM

CC: All counsel of record via ECF

Application GRANTED. Given the Court's entry of the parties' stipulation setting a schedule for the filing of an amended complaint and answer, the initial pre-trial conference scheduled for May 30, 2024, is hereby ADJOURNED to **August 27, 2024**, at **11:00 a.m.**, which date follows Defendant's answer deadline.

The conference will be telephonic, and the dial-in information is as follows: At the designated time, the parties shall call (888) 363-4749, and use access code 5123533.

The Clerk of Court is directed to terminate the pending motion at docket entry 15.

Dated: May 24, 2024  
New York, New York

SO ORDERED.

A handwritten signature in blue ink, reading "Katherine Polk Failla".

HON. KATHERINE POLK FAILLA  
UNITED STATES DISTRICT JUDGE